

1 Saipan
2 Commonwealth of the }
3 Northern Mariana Islands } s.s.
4

5 **DECLARATION OF CORAZON QUING**

6 CORAZON QUING, first being duly sworn, deposes and says as follows:

7 1. I am employed by L & T International Corporation (*hereinafter referred to as "L & T"*) as
8 HR Adviser. I am over the age of eighteen and competent to testify in court regarding this
matter.

9 2. On or about May 13, 2004, I, Paul Delos Santos, Analyn Loterio, Helen Lim, Charlie So,
10 HR Manager Malou Ernest and a representative from Legal Department Rhodora Bernabe
met with the finishing workers identified for reduction in force.

11 3. During the meeting, the identified employees were informed of the company situation and
12 the need to reduce workers due to economic necessity.

13 4. I took the lead in opening the meeting and read the communication plan. (See attached
14 Exhibit A).

15 5. I told them that they can ask us any questions they may have regarding the termination or
16 if they have any concerns.

17 6. Malou Ernest explained the purpose of the meeting and read a copy of the termination
18 letter.

19 7. Malou also informed them that we have prepared their last paychecks and a second check
20 to cover for 10 days pay in lieu of notice.

21 8. The termination notice provides that their employment is terminated effective 10 days
22 from receipt of the notice. However, since they were paid in advance for the 10 days,
23 they are no longer required to report to work.

24 9. I informed them that the company can recommend them to other companies under Tan
Holdings.

25 10. I informed the affected workers that they have the right to appeal the termination to the
26 Legal Department.

11. I also informed them that they can go to the Department of Labor and inquire about their
12. immigration status.
13. As a matter of policy, we are required to report to the Department of Labor about their
14. termination.
15. Some workers complain that they have paid for the processing of their permit with their
16. previous employer.
17. HR staff issued the Notice of Termination and the checks to those who approached them.
18. As a company policy, we asked them to surrender their ID's upon issuance of the checks.
19. Other workers left the room immediately after the briefing.
20. We informed them that we will prepare all the documents they need including copies of
21. their employment contracts.
22. Other workers went to HR Office immediately after receipt of the notice and requested
23. copies of their Employment contracts, Transmittal receipts and other original documents
24. previously submitted to HR.
25. After a few days, some workers returned to HR Office to receive their notice and checks.
26. Other workers went back to pick-up requested documents, while others did not show up
27. to pick-up copies of their employment contracts.
28. I declare under penalty of perjury that the foregoing facts are correct.

18 This 21st day of July, 2006.


MA. CORAZON QUING

23 Subscribed before me this 21st day of July, 2006.


KELLI BLALOCK
Notary Public
Commonwealth of the Northern Mariana Islands
My Commission Expires: Feb. 10, 2008
P.O.Box 505502 Saipan, MP 96950-5502

